PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT

Allegheny Ludlum Corporation
State Route 38 West
New Castle, Indiana 47362

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 065-7593-00014	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary metal heat treating and cold rolled steel sheet source.

Responsible Official:	Paul M. Ferrara
Source Address:	State Route 38 West, New Castle, Indiana 47362
Mailing Address:	State Route 38 West, New Castle, Indiana 47362
SIC Code:	3316 and 3398
County Location:	Henry
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) No. 11 A&P Annealing Furnace, identified as S001A, modified in 1998, fired by natural gas and using liquid propane gas as a backup fuel and exhausting to fugitive emission point P001, maximum capacity: 27 tons of steel per hour, and maximum heat input capacity: 60 million British thermal units per hour.

(b) One (1) No. 12 A&P Annealing Furnace, identified as S002A, constructed in 1967, fired by natural gas and using liquid propane gas as a backup fuel and exhausting to fugitive emission point P005, maximum capacity: 27 tons of steel per hour, and maximum heat input capacity: 40 million British thermal units per hour.

(c) One (1) No. 11 A&P Line Jet Cool Unit, identified as S001B, constructed in 1981, using a baghouse identified as D001 as control, and exhausting to stack P002, maximum capacity: 27 tons of steel per hour.

(d) One (1) No. 11 A&P Line Shot Blast Unit, identified as S001C, constructed in 1967 and replaced in 1995, using a baghouse identified as D002 as control, and exhausting to stack P003, maximum capacity: 27 tons of steel per hour.

(e) One (1) No. 11 A&P Acid Pickling Facility, identified as S001D, constructed in 1967, using a chemical scrubber identified as D003 as control, and exhausting to stack P004, maximum capacity: 27 tons of steel per hour.

(f) One (1) No. 12 A&P Kolene Rinse, identified as S002C, constructed in 1967 and replaced in 1996, using a chemical scrubber identified as D003 as control, and exhausting to stack P004, maximum capacity: 27 tons of steel per hour.

(g) One (1) No. 12 A&P Line Acid Pickling Facility, identified as S002D, constructed in 1967, using a chemical scrubber identified as D003 as control, and exhausting to stack P004, maximum capacity: 27 tons of steel per hour.

(h) One (1) North Boiler, identified as S006, installed in 1966, fired by natural gas, using liquid propane gas as a backup fuel and exhausting to stack P011, maximum heat input capacity: 20.92 million British thermal units per hour.

(i) One (1) Middle Boiler, identified as S007, installed in 1966, fired by natural gas using liquid propane gas as a backup fuel and exhausting to stack P012, maximum heat input capacity: 10.46 million British thermal units per hour.

(j) One (1) South Boiler, identified as S008, installed in 1966, fired by natural gas using liquid propane gas as a backup fuel and exhausting to stack P013, maximum heat input capacity: 10.46 million British thermal units per hour.

(k) One (1) Strip Grinder, identified as S003A, composed of four (4) grinding heads and four (4) eliminators, constructed in 1967, using oil mist eliminators identified as D004, D005 and D006 as control, and exhausting to stack P007, maximum capacity: 25 tons of steel per hour.

(l) One (1) Strip Polisher, identified as S003B, constructed in 1967, and exhausting to stack P008, maximum capacity: 25 tons of steel per hour.

(m) One (1) Z-Mill, identified as S004, constructed in 1967, using an oil mist eliminator identified as D007 as control, and exhausting to stack P009, maximum capacity: 35 tons of steel per hour.

(n) One (1) Temper Mill, identified as S005, constructed in 1967, and exhausting to fugitive emission point P010, maximum capacity: 50 tons of steel per hour.

(o) Three (3) Parts Cleaners, identified as S009A, constructed between 1980 and 1988, using a sealed reservoir as control, and exhausting to fugitive emission point P014, maximum throughput: 0.5 gallons of mineral spirits per hour.

(p) One (1) Parts Cleaner, identified as S009B, constructed between 1980 and 1988, using a sealed reservoir as control, and exhausting to fugitive emission point P015, maximum throughput: 0.5 gallons of kerosene per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22).

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled “Permit Shield.”

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

(b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source’s potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

(a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was based on continuous or intermittent data;

(4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);

(5) Any insignificant activity that has been added without a permit revision; and

(6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.13 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

(1) The applicable requirements are included and specifically identified in this permit; or

(2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]

(2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM,, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

(a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]

(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

(2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) IDEM, OAM, shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.27 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Major Source

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21, this source is a major source.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

(a) Has certified that all facilities at this source are in compliance with all applicable requirements; and

(b) Has submitted a statement that the Permittee will continue to comply with such requirements; and

(c) Will comply with such applicable requirements that become effective during the term of this permit.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.14 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus three percent (±3%) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 13, 1996.

(b) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(e) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.20 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

(a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.23 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(c) One (1) No. 11 A&P Line Jet Cool Unit, identified as S001B, constructed in 1981, using a baghouse identified as D001 as control, and exhausting to stack P002, maximum capacity: 27 tons of steel per hour.

(d) One (1) No. 11 A&P Line Shot Blast Unit, identified as S001C, constructed in 1967 and replaced in 1995, using a baghouse identified as D002 as control, and exhausting to stack P003, maximum capacity: 27 tons of steel per hour.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The particulate matter (PM) emissions from the No. 11 A&P Line Jet Cooler and No. 11 A&P Line Shot Blast Unit (S001B and S001C) each shall be limited to 37.3 pounds per hour for a process weight rate of 27.0 tons per hour, each. The limits stated above are based on the following equation for facilities with process weight rates of up to 60,000 pounds per hour:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour, and
P = process weight rate in tons per hour.

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facilities are in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.4 Particulate Matter (PM)

(a) The baghouse (D001) for PM control shall be in operation at all times when the No. 11 A&P Line Jet Cooler (S001B) is in operation and exhausting to the outside atmosphere.

(2) The baghouse (D002) for PM control shall be in operation at all times when the No. 11 A&P Line Shot Blast Unit (S001C) is in operation and exhausting to the outside atmosphere.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.5 Visible Emissions Notations

(a) Daily visible emission notations of the No. 11 A&P Line Jet Cooler and No. 11 A&P Line Shot Blast Unit (S001B and S001C) stacks (P002 and P003) exhaust shall be performed once per working shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.6 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the No. 11 A&P Line Jet Cooler and No. 11 A&P Line Shot Blast Unit (baghouses D001 and D002) when venting to the atmosphere. A baghouse inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.1.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across baghouses D001 and D002 used in conjunction with the No. 11 A&P Line Jet Cooler and No. 11 A&P Line Shot Blast Unit, at least once per day when the No. 11 A&P Line Jet Cooler and No. 11 A&P Line Shot Blast Unit are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.1.8 Broken Bag or Failed Bag Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

(a) To document compliance with Condition D.1.1 and D.1.5, the Permittee shall maintain records of daily visible emission notations of the No. 11 A&P Line Jet Cooler and No. 11 A&P Line Shot Blast Unit (S001B and S001C) stack exhausts.

(b) To document compliance with Condition D.1.1, the Permittee shall maintain records of the results of the inspections required under Condition D.1.6 and the dates the vents are redirected.

(c) To document compliance with Condition D.1.7, the Permittee shall maintain the following:

(1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle: frequency and differential pressure.

(2) Documentation of all response steps implemented, per event.

(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(8) Documentation of the dates vents are redirected.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(e) One (1) No. 11 A&P Acid Pickling Facility, identified as S001D, constructed in 1967, using a chemical scrubber identified as D003 as control, and exhausting to stack P004, maximum capacity: 27 tons of steel per hour.

(f) One (1) No. 12 A&P Kolene Rinse, identified as S002C, constructed in 1967 and replaced in 1996, using a chemical scrubber identified as D003 as control, and exhausting to stack P004, maximum capacity: 27 tons of steel per hour.

(g) One (1) No. 12 A&P Line Acid Pickling Facility, identified as S002D, constructed in 1967, using a chemical scrubber identified as D003 as control, and exhausting to stack P004, maximum capacity: 27 tons of steel per hour.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The particulate matter (PM) emissions from the No. 11 A&P Line Acid Pickling, No. 12 A&P Line Acid Pickling, and No. 12 A&P Line Kolene Rinse (S001D, S002D and S002C) each shall be limited to 37.3 pounds per hour for a process weight rate of 27.0 tons per hour, each. The limits stated above are based on the following equation for facilities with process weight rates of up to 60,000 pounds per hour:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour, and
P = process weight rate in tons per hour.

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facilities are in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.4 Particulate Matter (PM)

The wet chemical scrubber (D003) for PM control shall be in operation at all times when the No. 11 A&P Line Acid Pickling, No. 12 A&P Line Acid Pickling, or No. 12 A&P Line Kolene Rinse is in operation and exhausting to the outside atmosphere.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.5 Opacity [326 IAC 5-1]

(a) In accordance with Agreed Order, Cause A-3586, the Permittee shall monitor the chemical scrubber (D003) for compliance with 325 IAC 5-1. Observations shall be made a minimum of two (2) hours per week during times when the pickling line is in operation. The time of observations shall be staggered and not completed in a single day. Each opacity reading shall be a minimum of six (6) minutes in length. Such observations shall be in accordance with US EPA Method 9.

(b) In accordance with Agreed Order, Cause A-3586, if violations are noted in the Permittee's quarterly reports, IDEM may require a compliance plan detailing steps to be taken to alleviate the violations and to increase self monitoring to six (6) hours per week. The compliance plan shall be submitted within sixty (60) days from notification from IDEM of the requirement of a compliance plan. The increased self monitoring shall commence within fifteen (15) days from IDEM's notification of the requirement.

(c) Upon mutual agreement between the Permittee and IDEM, the Permittee may conduct a source test for PM at the chemical scrubber in lieu of requirements of (b). In order to substitute the source test for the compliance plan, the Permittee must demonstrate compliance with the applicable limits set forth in C.2 and D.2.1 and conduct the source test within ninety (90) days of the calendar month in which the opacity exceedances occurred.

D.2.6 Visible Emissions Notations

(a) Daily visible emission notations of the No. 11 A&P Line Acid Pickling, No. 12 A&P Line Acid Pickling, and No. 12 A&P Line Kolene Rinse (S001D, S002D, and S002C) stack (P004) exhaust shall be performed once per working shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.7 Parametric Monitoring

The Permittee shall take pressure, scrubbing liquid (water) flow rate, and recirculation pH readings from the wet chemical scrubber controlling the No. 11 A&P Line Acid Pickling, No. 12 A&P Line Acid Pickling and No. 12 A&P Line Kolene Rinse (S001D, S002D, and S002C), at least once per day when either of the facilities are in operation when venting to the atmosphere. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the wet chemical scrubber (D003) shall be maintained within the range of 2 to 10 inches of water and the flow rate for scrubbing liquid shall be maintained above 200 gallons of water per

minute or within a range and flow rate established during the latest stack test. The recirculation pH shall be maintained above 9.0. The Preventive Maintenance Plan for this unit shall contain trouble-shooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.8 Record Keeping Requirements

(a) To document compliance with Condition D.2.1, D.2.4, and D.2.6, the Permittee shall maintain records of daily visible emission notations of the No. 11 A&P Line Acid Pickling, No. 12 A&P Line Acid Pickling, and No. 12 A&P Line Kolene Rinse (S001D, S002D, and S002C) stack (P004) exhaust.

(b) To document compliance with Condition C.3 and D.2.5, the Permittee shall maintain records of opacity observations of the No. 11 A&P Line Acid Pickling, No. 12 A&P Line Acid Pickling and No. 12 A&P Line Kolene Rinse (S001D, S002D and S002C) stack (P004) exhaust.

(c) To document compliance with Condition D.2.7, the Permittee shall maintain the following:

(1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:

(A) pressure drop;

(B) scrubbing liquid (water) flow rate; and

(C) recirculation PH.

(2) Documentation of all response steps implemented, per event.

(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(8) Documentation of the dates vents are redirected.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.9 Reporting Requirements

In accordance with Agreed Order, Cause A-3586, reports of visible emissions monitoring will be submitted within thirty (30) days after the end of each calendar quarter.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(h) One (1) North Boiler, identified as S006, installed in 1966, fired by natural gas, using liquid propane gas as a backup fuel and exhausting to stack P011, maximum heat input capacity: 20.92 million British thermal units per hour.

(i) One (1) Middle Boiler, identified as S007, installed in 1966, fired by natural gas using liquid propane gas as a backup fuel and exhausting to stack P012, maximum heat input capacity: 10.46 million British thermal units per hour.

(j) One (1) South Boiler, identified as S008, installed in 1966, fired by natural gas using liquid propane gas as a backup fuel and exhausting to stack P013, maximum heat input capacity: 10.46 million British thermal units per hour.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-2-3]

The North Boiler, Middle Boiler, and South Boiler installed in 1966 shall be limited to PM emissions of 0.708 pound of PM per million British thermal units. This limit is based on the following equation:

$$Pt = © \times a \times h) / (76.5 \times Q^{0.75} \times N^{0.25})$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input.

C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic feet per minute meter for a period not to exceed a sixty (60) minute time period.

N = Number of stacks in fuel burning operation.

a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 million British thermal units per hour heat input.

h = Stack height in feet. If a number of stacks of different heights exist, the average stack height will be computed using a weighted average of stack heights.

$$Pt = (50\ \mu g/m^3 \times 0.67 \times 35ft) / (76.5 \times 41.84^{0.75} \times 3^{0.25}) = 0.708\ lbs\ PM / MMBtu$$

Compliance Determination Requirements

D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facilities are in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.3 Reporting Requirements

The Permittee shall certify within thirty (30) days after the end of the quarter being reported, using the reporting form located at the end of this permit, or its equivalent, which fuels were fired in the boilers during the report period and the dates of use.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(k) One (1) Strip Grinder, identified as S003A, composed of four (4) grinding heads and four (4) eliminators, constructed in 1967, using oil mist eliminators identified as D004, D005 and D006 as control, and exhausting to stack P007, maximum capacity: 25 tons of steel per hour.

(l) One (1) Strip Polisher, identified as S003B, constructed in 1967, and exhausting to stack P008, maximum capacity: 25 tons of steel per hour.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The particulate matter (PM) emissions from the Strip Grinder and Strip Polisher (S003A and S003B) each shall be limited to 35.4 pounds per hour for a process weight rate of 25.0 tons per hour, each. The limits stated above are based on the following equation for facilities with process weight rates of up to 60,000 pounds per hour:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour, and
P = process weight rate in tons per hour.

D.4.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the Strip Grinder and its control device.

Compliance Determination Requirements

D.4.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facilities are in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.4 Particulate Matter (PM)

The mist eliminators (D004, D005 and D006) for PM control shall be in operation at all times when the Strip Grinder is in operation and exhausting to the outside atmosphere.

D.4.5 Oil Mist Eliminator Inspections

The following inspections shall be performed of the oil mist eliminators (D004, D005, and D006) controlling the Strip Grinder when venting to the atmosphere.

(1) Monthly inspections of the motor amperages during normal operation:

(2) Quarterly inspections of the following operational parameters during normal operation:

(A) Mist eliminator inspections for oil/solids build up and plugging. Clean, as required.

(B) Fan impeller inspections for solids buildup or erosion. Clean or repair, as required.

(3) Annual inspections of the exhaust system components for solids buildup and signs of corrosion or excessive wear which may impact the operation of the oil mist eliminators. Clean or replace, as required.

D.4.6 Failure Detection

In the event that failure of the oil mist eliminators has been observed:

(a) The affected oil mist eliminators will be shut down immediately until the failed units have been cleaned or replaced.

(b) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Preventive Maintenance Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Preventive Maintenance Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.

D.4.7 Visible Emissions Notations

(a) Daily visible emission notations of the Strip Grinder stack exhaust (P007) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.8 Record Keeping Requirements

(a) To document compliance with Condition D.4.5, the Permittee shall maintain the following:

(1) Monthly records of the motor amperage inspections during normal operation when venting to the atmosphere.

(2) Quarterly records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Mist eliminator inspections for oil/solids build up and plugging.

(B) Fan impeller inspections for solids buildup or erosion.

(3) Annual records of the inspections of exhaust system components for solids buildup and signs of corrosion or excessive wear which may impact the operation of the oil mist eliminators.

(4) Documentation of all response steps implemented, per event.

(5) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(6) Quality Assurance/Quality Control (QA/QC) procedures.

(7) Operator standard operating procedures (SOP).

(8) Manufacturer's specifications or its equivalent.

(9) Equipment "troubleshooting" contingency plan.

(10) Documentation of the dates vents are redirected.

(b) To document compliance with Condition D.4.4 and D.4.7, the Permittee shall maintain records of daily visible emission notations of the Strip Grinder (S003A) stack (P007) exhaust.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(m) One (1) Z-Mill, identified as S004, constructed in 1967, using an oil mist eliminator identified as D007 as control, and exhausting to stack P009, maximum capacity: 35 tons of steel per hour.

(n) One (1) Temper Mill, identified as S005, constructed in 1967, and exhausting to fugitive emission point P010, maximum capacity: 50 tons of steel per hour.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The particulate matter (PM) emissions from the Z-Mill (S004) shall be limited to 41.3 pounds per hour for a process weight rate of 35.0 tons per hour. The limit stated above is based on the following equation for facilities with the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 55.0 P^{0.11} - 40$ where E = rate of emission in pounds per hour, and
P = process weight rate in tons per hour.

D.5.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the Z-Mill and its control device.

Compliance Determination Requirements

D.5.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facilities are in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.5.4 Particulate Matter (PM)

The mist eliminator (D007) for PM control shall be in operation at all times when the Z-Mill is in operation and exhausting to the outside atmosphere.

D.5.5 Oil Mist Eliminator Inspections

The following inspections shall be performed of the oil mist eliminator (D007) controlling the Z-Mill when venting to the atmosphere.

(1) Monthly inspections of the motor amperages during normal operation when venting to the atmosphere.

(2) Quarterly inspections of the following operational parameters during normal operation when venting to the atmosphere:

(A) Mist eliminator inspections for oil/solids build up and plugging. Clean, as required.

(B) Fan impeller inspections for solids buildup or erosion. Clean or repair, as required.

(3) Annual inspections of the exhaust system components for solids buildup and signs of corrosion or excessive wear which may impact the operation of the oil mist eliminators. Clean or replace, as required.

D.5.6 Failure Detection

In the event that failure of the oil mist eliminator has been observed:

(a) The affected oil mist eliminator will be shut down immediately until the failed units have been cleaned or replaced.

(b) Within eight (8) hours of the determination of failure, response steps according to the time-table described in the Preventive Maintenance Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Preventive Maintenance Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.

D.5.7 Visible Emissions Notations

(a) Daily visible emission notations of the Z-Mill stack (P009) exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.8 Record Keeping Requirements

(a) To document compliance with Condition D.5.5, the Permittee shall maintain the following:

(1) Monthly records of the motor amperage inspections during normal operation when venting to the atmosphere.

(2) Quarterly records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Mist eliminator inspections for oil/solids build up and plugging.

(B) Fan impeller inspections for solids buildup or erosion.

(3) Annual records of the inspections of exhaust system components for solids buildup and signs of corrosion or excessive wear which may impact the operation of the oil mist eliminators.

(4) Documentation of all response steps implemented, per event.

(5) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(6) Quality Assurance/Quality Control (QA/QC) procedures.

(7) Operator standard operating procedures (SOP).

(8) Manufacturer's specifications or its equivalent.

(9) Equipment "troubleshooting" contingency plan.

(10) Documentation of the dates vents are redirected.

(b) To document compliance with Condition D.5.7, the Permittee shall maintain records of daily visible emission notations of the Z-Mill (S003A) stack (P009) exhaust.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.6 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(o) Three (3) Parts Cleaners, identified as S009A, constructed between 1980 and 1988, using a sealed reservoir as control, and exhausting to fugitive emission point P014, maximum throughput: 0.5 gallons of mineral spirits per hour.

(p) One (1) Parts Cleaner, identified as S009B, constructed between 1980 and 1988, using a sealed reservoir as control, and exhausting to fugitive emission point P015, maximum throughput: 0.5 gallons of kerosene per hour.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Volatile Organic Compounds [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Organic Solvent Degreasing Operations), the owner or operator of the (3) Parts Cleaners, identified as S009A, and the one (1) Parts Cleaner, identified as S009B, shall:

(a) equip the cleaner with a cover;

(b) equip the cleaner with a facility for draining cleaned parts;

(c) close the degreaser cover whenever parts are not being handled in the cleaner;

(d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) provide a permanent, conspicuous label summarizing the operating requirements;

(f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.6.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

SECTION D.7 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] - Insignificant Activities

The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.7.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the brazing equipment, cutting torches, soldering equipment, and welding equipment shall not exceed allowable PM emission rate based on the following equations:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

or

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 55.0\ P^{0.11} - 4$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

Compliance Determination Requirement

D.7.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facilities are in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.7.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Allegheny Ludlum Corporation
Source Address: State Route 38 West, New Castle, Indiana 47362
Mailing Address: State Route 38 West, New Castle, Indiana 47362
Part 70 Permit No.: T 065-7593-00014

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Allegheny Ludlum Corporation
Source Address: State Route 38 West, New Castle, Indiana 47362
Mailing Address: State Route 38 West, New Castle, Indiana 47362
Part 70 Permit No.: T 065-7593-00014

Months: _____ to_____ Year:_____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	**Number of Deviations**	**Date of Each Deviation**

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Allegheny Ludlum Corporation
Source Address: State Route 38 West, New Castle, Indiana 47364
Mailing Address: State Route 38 West, New Castle, Indiana 47362
Part 70 Permit No.: T 065-7593-00014

This form consists of 2 pages **Page 1 of 2**

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten (**10**) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Describe the cause of the Emergency/Deviation:

Description of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
NATURAL GAS FIRED BOILER CERTIFICATION

Source Name: Allegheny Ludlum Corporation
Source Address: State Route 38 West, New Castle, Indiana 47364
Mailing Address: State Route 38 West, New Castle, Indiana 47362
Part 70 Permit No.: T 065-7593-00014

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Report period
Beginning: _____
Ending: _____

Boiler Affected	Alternate Fuel	Days burning alternate fuel From	To

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit and Enhanced New Source Review

Source Background and Description

Source Name:	**Allegheny Ludlum Corporation**
Source Location:	**State Route 38 West, New Castle, Indiana 47362**
County:	**Henry**
SIC Code:	**3316 and 3398**
Operation Permit No.:	**T 065-7593-00014**
Permit Reviewer:	**CarrieAnn Ortolani**

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Allegheny Ludlum Corporation relating to the operation of metal heat treating and cold rolled steel sheet source. This source was constructed between 1965 and 1967. Jet recuperators installed on the No. 11 A&P Line annealing furnace in 1981 and on the No. 12 A&P Line annealing furnace in 1975 resulted in an increase in the capacity of the lines. The increase in capacity did not require a permit, but has been accounted for in the Part 70 permit and in previous permits.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) No. 11 A&P Line Jet Cool Unit, identified as S001B, constructed in 1981, using a baghouse identified as D001 as control, and exhausting to stack P002, maximum capacity: 27 tons of steel per hour.

(b) One (1) No. 11 A&P Line Shot Blast Unit, identified as S001C, constructed in 1967 and replaced in 1995, using a baghouse identified as D002 as control, and exhausting to stack P003, maximum capacity: 27 tons of steel per hour.

(c) One (1) No. 11 A&P Acid Pickling Facility, identified as S001C, constructed in 1967, using a chemical scrubber identified as D003 as control, and exhausting to stack P004, maximum capacity: 27 tons of steel per hour.

(d) One (1) No. 12 A&P Kolene Rinse, identified as S002C, constructed in 1967 and replaced in 1996, using a chemical scrubber identified as D003 as control, and exhausting to stack P004, maximum capacity: 27 tons of steel per hour.

(e) One (1) No. 12 A&P Line Acid Pickling Facility, identified as S002D, constructed in 1967, using a chemical scrubber identified as D003 as control, and exhausting to stack P004, maximum capacity: 27 tons of steel per hour.

(f) One (1) North Boiler, identified as S006, installed in 1966, fired by natural gas, using liquid propane gas as a backup fuel and exhausting to stack P011, maximum heat input capacity: 20.92 million British thermal units per hour.

(g) One (1) Middle Boiler, identified as S007, installed in 1966, fired by natural gas using liquid propane gas as a backup fuel and exhausting to stack P012, maximum heat input capacity: 10.46 million British thermal units per hour.

(h) One (1) South Boiler, identified as S008, installed in 1966, fired by natural gas using liquid propane gas as a backup fuel and exhausting to stack P013, maximum heat input capacity: 10.46 million British thermal units per hour.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units:

(i) One (1) No. 11 A&P Annealing Furnace, identified as S001A, constructed in 1967, fired by natural gas and using liquid propane gas as a backup fuel and exhausting to fugitive emission point P001, maximum capacity: 27 tons of steel per hour, and maximum heat input capacity: 42 million British thermal units per hour.

(j) One (1) No. 12 A&P Annealing Furnace, identified as S002A, constructed in 1967, fired by natural gas and using liquid propane gas as a backup fuel and exhausting to fugitive emission point P005, maximum capacity: 27 tons of steel per hour, and maximum heat input capacity: 40 million British thermal units per hour.

(k) One (1) Strip Grinder, identified as S003A, constructed in 1967, using oil mist eliminators identified as D004, D005 and D006 as control, and exhausting to stack P007, maximum capacity: 25 tons of steel per hour.

(l) One (1) Strip Polisher, identified as S003B, constructed in 1967, and exhausting to stack P008, maximum capacity: 25 tons of steel per hour.

(m) One (1) Z-Mill, identified as S004, constructed in 1967, using an oil mist eliminator identified as D007 as control, and exhausting to stack P009, maximum capacity: 35 tons of steel per hour.

(n) One (1) Temper Mill, identified as S005, constructed in 1967, and exhausting to fugitive emission point P010, maximum capacity: 50 tons of steel per hour.

(o) Three (3) Parts Cleaners, identified as S009A, constructed between 1980 and 1988, using a sealed reservoir as control, and exhausting to fugitive emission point P014, maximum throughput: 0.5 gallons of mineral spirits per hour.

(p) One (1) Parts Cleaner, identified as S009B, constructed between 1980 and 1988, using a sealed reservoir as control, and exhausting to fugitive emission point P015, maximum throughput: 0.5 gallons of kerosene per hour.

Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)

Items (i) through (p) listed above are being reviewed under the ENSR process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

(b) Propane for liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) British thermal units per hour.

(c) Combustion source flame safety purging on startup.

(d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

(e) The following VOC and HAP storage containers: Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons; Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.

(f) Refractory storage not requiring air pollution control equipment.

(g) Machining where an aqueous cutting coolant continuously floods the machining interface.

(h) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(i) Rolling oil recovery systems.

(j) Solvent recycling systems with batch capacity less than or equal to 100 gallons.

(k) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent (1%) by volume.

(l) Quenching operations used with heat treating processes.

(m) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(n) Heat exchanger cleaning and repair.

(o) Process vessel degassing and cleaning to prepare for internal repairs.

(p) Paved and unpaved roads and parking lots with public access.

(q) Asbestos abatement projects regulated by 326 IAC 14-10.

(r) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(s) On-site fire and emergency response training approved by the department.

(t) Other emergency equipment as follows: Stationary fire pumps.

(u) Purge double block and bleed valves.

(v) A laboratory as defined in 326 IAC 2-7-1(21)(C).

(w) The following equipment resulting in HAP emissions of less than one (1) ton per year:

(1) One (1) hydrofluoric acid (HF) storage tank, identified and S010A, vented through a series of three (3) knockout drums, capacity: 10,000 gallons.

(2) One (1) waste nitric acid storage tank, identified as S010B, vented through a series of three (3) knockout drums, capacity: 8,000 gallons.

Existing Approvals

The source has been operating under the following approvals:

(a) OP 33-04-87-0106, issued on March 13, 1983

(b) OP 33-04-92-0119, issued on December 19, 1989

Enforcement Issue

(a) IDEM is aware that the following equipment has been constructed and operated prior to receipt of the proper permit. Equipment constructed prior to 1968 did not require a construction permit, but should have received an operation permit.

(1) One (1) No. 11 A&P Annealing Furnace, identified as S001A, constructed in 1967, fired by natural gas and using liquid propane gas as a backup fuel and exhausting to fugitive emission point P001, maximum capacity: 27 tons of steel per hour, and maximum heat input capacity: 42 million British thermal units per hour.

(2) One (1) No. 12 A&P Annealing Furnace, identified as S002A, constructed in 1967, fired by natural gas and using liquid propane gas as a backup fuel and exhausting to fugitive emission point P005, maximum capacity: 27 tons of steel per hour, and maximum heat input capacity: 40 million British thermal units per hour.

(3) One (1) Strip Grinder, identified as S003A, constructed in 1967, using oil mist eliminators identified as D004, D005 and D006 as control, and exhausting to stack P007, maximum capacity: 25 tons of steel per hour.

(4) One (1) Strip Polisher, identified as S003B, constructed in 1967, and exhausting to stack P008, maximum capacity: 25 tons of steel per hour.

(5) One (1) Z-Mill, identified as S004, constructed in 1967, using an oil mist eliminator identified as D007 as control, and exhausting to stack P009, maximum capacity: 35 tons of steel per hour.

(6) One (1) Temper Mill, identified as S005, constructed in 1967, and exhausting to fugitive emission point P010, maximum capacity: 50 tons of steel per hour.

(7) Three (3) Parts Cleaners, identified as S009A, constructed between 1980 and 1988, using a sealed reservoir as control, and exhausting to fugitive emission point P014, maximum throughput: 0.5 gallons of mineral spirits per hour.

(8) One (1) Parts Cleaner, identified as S009B, constructed between 1980 and 1988, using a sealed reservoir as control, and exhausting to fugitive emission point P015, maximum throughput: 0.5 gallons of kerosene per hour.

(b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of enhanced new source review.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

(a) Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

(b) An administratively complete Part 70 permit application for the purposes of this review was received on December 13, 1996. Additional information was received on January 5, 1998.

(c) A notice of completeness letter was mailed to the source on January 13, 1997.

Emission Calculations

See pages 1 through 7 of 7 of Appendix A of this document for detailed emissions calculations.

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	**Potential Emissions** (tons/year)
PM	greater than 250
PM_{10}	greater than 250
SO_2	less than 100
VOC	greater than 250
CO	less than 100
NO_x	greater than 250

Note: For the purpose of determining Title V applicability for particulates, PM_{10}, not PM, is the regulated pollutant in consideration.

HAPs	**Potential Emissions** (tons/year)
Methanol	less than 10
MIBK	less than 10
Chromium	less than 10
Manganese	less than 10
Nickel	greater than 10
HF	greater than 10
TOTAL	greater than 25

(a) The potential emissions (as defined in the Indiana Rule) of PM_{10}, VOC, and NO_x are equal to or greater than 100 tons per year, each. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential emissions (as defined in Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is one of the 28 listed source categories under 326 IAC 2-2, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are counted toward determination of PSD applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects 1996 emission data. The actual emissions of criteria pollutants are those reported in the Airs Facility Quick Look Report published July 24, 1997. The actual emissions of hazardous air pollutants (HAPs) are based on calculations using emission factors supplied by the source. There are no HAP emissions on file at IDEM for this source.

Pollutant	Actual Emissions (tons/year)
PM	42.1
PM_{10}	37.6
SO_2	0.152
VOC	75.0
CO	1.64
Methanol	6.65
MIBK	4.38
Chromium	0.093
Manganese	0.046
Nickel	0.267
HF	0.130
NO_x	115

Limited Potential to Emit

The table below summarizes the total limited potential to emit of the emission units.

	Limited Potential to Emit (tons/year)						
Process/ facility	PM	PM_{10}	SO_2	VOC	CO	NO_X	HAPs
No. 11 & No. 12 A&P Line Annealing Furnaces (S001A & S002A)	4.92	4.92	0.215	25.6	12.6	72.6	0.00
No. 11 A&P Line Jet Cooler and Shot Blast Unit (S001B & S001C)	11.7	10.6	0.0	0.0	0.0	0.0	0.371
No. 11 & No. 12 A&P Line Acid Pickling & No. 12 A&P Line Kolene Rinse (S001D, S002D & S002C)	5.67	4.25	0.0	0.0	0.0	274	0.165

	Limited Potential to Emit (tons/year)						
Strip Grinder & Strip Polisher (S003A & S003B)	25.2	18.7	0.0	0.0	0.0	0.0	0.0
Z-Mill & Temper Mill (S004 & S005)	55.2	55.2	0.0	197	0.0	0.0	11.0
North, Middle & South Boilers (S006, S007 & S008)	2.52	2.52	0.109	0.977	6.41	37.1	0.0
Two (2) Parts Cleaners (S009A & S009B)	0.0	0.0	0.0	5.88	0.0	0.0	0.0
Insignificant Activities	5.0	5.0	1.0	2.0	1.0	1.0	2.0
Total Emissions	110	101	1.32	231	20.0	385	13.5

The values in this table represent potential emissions after controls.

County Attainment Status

The source is located in Henry County.

Pollutant	**Status**
TSP	attainment
PM_{10}	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Henry County has been designated as attainment or unclassifiable for ozone.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) This source is not subject to 40 CFR 420.90, Subpart I because the acid pickling pollutants are not discharged to public water works.

(b) There are no New Source Performance Standards (326 IAC 12) applicable to this source.

(c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-1-3.4 (New Source Air Toxics Control)

This source was constructed prior to July 27, 1997. Therefore, the requirements of 326 IAC 2-1-3.4 do not apply.

326 IAC 2-2 (PSD)

(a) This source has the potential to emit more than 100 tons per year of PM, PM_{10}, VOC, and NOx.

(b) Since this type of operation is one of the 28 listed source categories under 326 IAC 2-2, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are counted toward determination of PSD applicability.

(c) This source is a major PSD source pursuant to 326 IAC 2-2, but the source is not required to obtain a PSD permit since construction commenced prior to August 7, 1977.

(d) The Parts Cleaners (S009A and S009B) constructed after 1977 have a potential to emit after controls of less than 40 tons per year of VOC. No other modifications commencing construction after August 7, 1977 required a permit pursuant to 326 IAC 2-1. Therefore, the modifications are minor modifications to an existing major source.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC, NO_x, and PM_{10}. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

(a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4.

(b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), fugitive dust will not be permitted to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). Rule 326 IAC 6-4-2(4) regarding visible dust is not federally enforceable.

State Rule Applicability - Individual Facilities

326 IAC 1-6 (Malfunctions)

Preventive Maintenance Plans are required for the following facilities with control devices and allowable emissions greater than ten (10) pounds per hour: No. 11 A&P Line Jet Cool Unit, No. 11 A&P Line Shot Blast Unit, No. 11 A&P Line Acid Pickling Facility, No. 12 A&P Line Acid Pickling Facility, No. 12 A&P Line Kolene Rinse, Strip Grinder, Z-Mill, and Parts Cleaners. A Preventive Maintenance Plan is also required for the Temper Mill with no control device but actual emissions of more than twenty-five (25) tons per year of VOC.

326 IAC 1-7 (Stack Height Provisions)

(a) Since stacks P001, P003, P004, P005, P007, P008, P009, P010, P011, P012, and P013 were constructed prior to 1979, the requirements of 326 IAC 1-7 do not apply to those stacks.

(b) Since stacks P002, P014 and P015 have potential PM and SO_2 emissions less than 25 tons per year, each, the requirements of 326 IAC 1-7 do not apply to those stacks.

326 IAC 6-2-3 (Particulate Emissions Limitations for Facilities Constructed prior to June 8, 1972)

The South Boiler, Middle Boiler and North Boiler installed in 1966 are subject to 326 IAC 6-2-3(b). The total heat input capacity for the three (3) boilers is 41.84 million British thermal units per hour. The three (3) boilers will be limited by the following equation:

$$Pt = (C \times a \times h) / (76.5 \times Q^{0.75} \times N^{0.25})$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input.

C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty (60) minute time period.

N = Number of stacks in fuel burning operation.

a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 million British thermal units per hour heat input.

h = Stack height in feet. If a number of stacks of different heights exist, the average stack height will be computed using a weighted average of stack heights.

$$Pt = (50\ \mu g/m^3 \times 0.67 \times 35ft) / (76.5 \times 41.84^{0.75} \times 3^{0.25}) = 0.708\ lb\ PM / MMBtu$$

The three (3) boilers will be limited to emissions of 0.708 pound PM per million British thermal units (MMBtu). The potential PM emissions of the three (3) boilers are:

2.52 tons of PM per year / 41.84 MMBtu per hour = 0.574 pounds of PM per hour / 41.84 MMBtu per hour = 0.014 pounds of PM per million British thermal units.

Therefore, the three (3) boilers will comply with this rule.

326 IAC 6-3-2 (Process Operations)

(a) The particulate matter (PM) emissions from the No. 11 A&P Line and No. 12 A&P Line Annealing Furnaces (S001A and S002A) each will be limited to 37.3 pounds per hour for a process weight rate of 27.0 tons per hour, each. Since potential PM emissions from the No. 11 A&P Line Annealing Furnace (S001A) are 0.575 and the potential PM emissions from the No. 12 A&P Line Annealing Furnace (S002A) are 0.548 pounds per hour, the two (2) annealing furnaces will comply with this rule. The limits stated above are based on the following equation for facilities with process weight rates of up to 60,000 pounds per hour:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour, and
P = process weight rate in tons per hour.

(b) The particulate matter (PM) emissions from the No. 11 A&P Line Jet Cooler and Shot Blast Unit (S001B and S001C) each will be limited to 37.3 pounds per hour for a process weight rate of 27.0 tons per hour, each. Since potential PM emissions after controls from the No. 11 A&P Line Jet cooler unit (S001B) are 1.38 and the potential PM emissions after controls from the No. 11 A&P Line Shot Blast Unit (S002C) are 1.30 pounds per hour, the No. 11 A&P Line Jet Cooler and Shot Blast Unit (S001B and S001C) will comply with this rule. Compliance will be demonstrated by operating the jet cooler baghouse (D001) at all times when the No. 11 A&P Line Jet Cooler is in operation and the shot blast baghouse (D002) when the No. 11 A&P Line Shot Blast Unit is in operation. The limits stated above are based on the following equation for facilities with process weight rates of up to 60,000 pounds per hour:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour, and
P = process weight rate in tons per hour.

(c) The particulate matter (PM) emissions from the No. 11 A&P Line Acid Pickling, No. 12 A&P Line Acid Pickling, and No. 12 A&P Line Kolene Rinse (S001D, S002D, and S002C) each will be limited to 37.3 pounds per hour for a process weight rate of 27.0 tons per hour, each. Since potential PM emissions after controls from the No. 11 A&P Line Acid Pickling unit (S001D) are 0.243 pounds per hour, the potential PM emissions after controls from the No. 12 A&P Line Acid Pickling (S002D) are 0.243 pounds per hour, and the potential PM emissions after controls from the No. 12 A&P Line Kolene Rinse (S002C) are 0.810 pounds per hour, the No. 11 A&P Line Acid Pickling, No. 12 A&P Line Acid Pickling, and No. 12 A&P Line Kolene Rinse will comply with this rule. Compliance will be demonstrated by operating the wet chemical scrubber (D003) at all times when any of the facilities are in operation. The source will also be required to abide by the Agreed Order, Cause No. A-3586 for these facilities. The limits stated above are based on the following equation for facilities with process weight rates of up to 60,000 pounds per hour:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour, and
P = process weight rate in tons per hour.

(d) The particulate matter (PM) emissions from the Strip Grinder and Strip Polisher (S003A and S003B) each will be limited to 35.4 pounds per hour for a process weight rate of 25.0 tons per hour, each. Since potential PM emissions after controls from the Strip Grinder (S003A) are 3.25 pounds per hour and the potential PM emissions from the Strip Polisher (S003B) are 2.50 pounds per hour, the Strip Grinder and Strip Polisher will comply with this rule. Compliance will be demonstrated by operating the mist eliminators (D004, D005, and D006) at all times when the Strip Grinder is in operation. The limits stated above are based on the following equation for facilities with process weight rates of up to 60,000 pounds per hour:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour, and
P = process weight rate in tons per hour.

(e) The particulate matter (PM) emissions from the Z-Mill (S004) will be limited to 41.3 pounds per hour for a process weight rate of 35.0 tons per hour. Since potential PM emissions after controls from the Z-Mill (S004) are 12.6 pounds per hour the Z-Mill will comply with this rule. Compliance will be demonstrated by operating the mist eliminator (D007) at all times when the Z-Mill is in operation. The limits stated above are based on the following equation for facilities with the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 55.0\ P^{0.11} - 40$ where E = rate of emission in pounds per hour, and
P = process weight rate in tons per hour.

See pages 1 through 3 of 7 of TSD Appendix A for detailed calculations.

326 IAC 8-1-6 (New facilities; General reduction requirements)

(a) The Temper Mill with potential VOC emissions greater than 25 tons per year was constructed prior to January 1, 1980. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

(b) The only other facilities with potential VOC emissions greater than 25 tons per year are the Parts Cleaners which are subject to 326 IAC 8-3-2. Therefore, the requirements of 326 IAC 8-1-6 are not applicable to this source.

326 IAC 8-3-2 (Organic Solvent Degreasing Operations)

The three (3) Parts Cleaners, identified as S009A, and the one (1) Parts Cleaner, identified as S009B, were constructed after January 1, 1980 and before July 1, 1990 in Henry County. Therefore, the requirements of 326 IAC 8-3-2 are applicable. The owner or operator of the cold cleaning facilities will be required to:

(a) equip the cleaner with a cover;

(b) equip the cleaner with a facility for draining cleaned parts;

(c) close the degreaser cover whenever parts are not being handled in the cleaner;

(d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) provide a permanent, conspicuous label summarizing the operating requirements;

(f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-6-1 (Organic Solvent Emission Limitations)

(a) Since the parts cleaners (S009A and S009B) were constructed after 1980, the requirements of 326 IAC 8-6-1 do not apply.

(b) Since the Temper Mill was in existence prior to October 7, 1974 in Henry County, the requirements of 326 IAC 8-6-1 do not apply.

326 IAC 10-1 (NOx Control In Clark and Floyd Counties)

Since this source is not in Clark or Floyd counties, the requirements of 326 IAC 10-1 do not apply.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

(a) The No. 11 A&P Line Jet Cooler and Shot Blast Unit (S001B and S001C) have applicable compliance monitoring conditions as specified below:

(1) Daily visible emissions notations of the No. 11 A&P Line Jet Cooler and Shot Blast Unit (S001B and S001C) shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

(2) An inspection shall be performed each calender quarter of all bags controlling the No. 11 A&P Line Jet Cooler and Shot Blast Unit (baghouses D001 and D002) when venting to the atmosphere. A baghouse inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

These monitoring conditions are necessary because the baghouses for the No. 11 A&P Line Jet Cooler and Shot Blast Unit (baghouses D001 and D002) must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

(b) The No. 11 A&P Line Acid Pickling, No. 12 A&P Line Acid Pickling, and No. 12 A&P Line Kolene Rinse (S001D, S002D and S002C) have applicable compliance monitoring conditions as specified below:

(1) Daily visible emissions notations of the No. 11 A&P Line Acid Pickling, No. 12 A&P Line Acid Pickling, and No. 12 A&P Line Kolene Rinse (S001D, S002D and S002C) shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

(2) In accordance with Agreed Order, Cause A-3586, the Permittee shall monitor the chemical scrubber for compliance with 325 IAC 5-1. Observations shall be made a minimum of two (2) hours per week during times when the pickling lines are in operation. The time of observations shall be staggered and not completed in a single day. Each opacity reading shall be a minimum of six (6) minutes in length. Such observations shall be in accordance with US EPA Method 9.

(3) The Permittee shall take pressure, scrubbing liquid (water) flow rate, and recirculation pH readings from the wet chemical scrubber controlling the No. 11 A&P Line Acid Pickling, No. 12 Line Acid Pickling, and No. 12 Line Kolene Rinse (S001D, S002D, and S002C), at least once per working shift when the facilities are in operation when venting to the atmosphere. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the wet chemical scrubber (D003) shall be maintained within the range of 2 to 10 inches of water and the flow rate for scrubbing liquid shall be maintained above 200 gallons of water per minute or within a range and flow rate established during the latest stack test. The recirculation pH shall be maintained above 9.0. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary because the chemical scrubber for the No. 11 A&P Line Acid Pickling, No. 12 A&P Line Acid Pickling, and No. 12 A&P Line Kolene Rinse (S001D, S002D, and S002C) must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

(c) The Strip Grinder (S003A) has applicable compliance monitoring conditions as specified below:

(1) Daily visible emissions notations of the Strip Grinder (S003A) shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1)

month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

(2) The mist eliminators (D004, D005 and D006) for PM control shall be in operation at all times when the Strip Grinder is in operation and exhausting to the outside atmosphere.

(3) The following inspections shall be performed of the oil mist eliminators (D004, D005, and D006) controlling the Strip Grinder when venting to the atmosphere.

(A) Monthly inspections of the motor amperages during normal operation:

(B) Quarterly inspections of the following operational parameters during normal operation:

(i) Mist eliminator inspections for oil/solids build up and plugging. Clean, as required.

(ii) Fan impeller inspections for solids buildup or erosion. Clean or repair, as required.

(C) Annual inspections of the exhaust system components for solids buildup and signs of corrosion or excessive wear which may impact the operation of the oil mist eliminators. Clean or replace, as required.

These monitoring conditions are necessary because the mist eliminators must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

(d) The Z-Mill and Temper Mill (S004 and S005) have applicable compliance monitoring conditions as specified below:

(1) Daily visible emissions notations of the Z-Mill (S004) shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

(2) The mist eliminator (D007) for PM control shall be in operation at all times when the Z-Mill is in operation and exhausting to the outside atmosphere.

(3) The following inspections shall be performed of the oil mist eliminator (D007) controlling the Z-Mill when venting to the atmosphere.

(A) Monthly inspections of the motor amperages during normal operation when venting to the atmosphere.

(B) Quarterly inspections of the following operational parameters during normal operation when venting to the atmosphere:

(i) Mist eliminator inspections for oil/solids build up and plugging. Clean, as required.

(ii) Fan impeller inspections for solids buildup or erosion. Clean or repair, as required.

(C) Annual inspections of the exhaust system components for solids buildup and signs of corrosion or excessive wear which may impact the operation of the oil mist eliminators. Clean or replace, as required.

These monitoring conditions are necessary to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

(a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act.

(b) See pages 1 through 4 of 7 of Appendix A for detailed air toxic calculations.

Conclusion

The operation of this metal heat treating and cold rolled steel sheet source shall be subject to the conditions of the attached proposed **Part 70 Permit No. T 065-7593-00014.**

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for a Part 70 Operating Permit

Source Name:	Allegheny Ludlum Corporation
Source Location:	State Route 38 West, New Castle, Indiana 47362
County:	Henry
SIC Code:	3316 and 3398
Operation Permit No.:	T 065-7593-00014
Permit Reviewer:	CarrieAnn Ortolani

On March 25, 1998, the Office of Air Management (OAM) had a notice published in the Courier Times, New Castle, Indiana, stating that Allegheny Ludlum Corporation had applied for a Part 70 Operating Permit to operate a cold-rolled steel sheet and strip and metal heat treating operation with baghouses and oil mist eliminators as controls. The notice also stated that OAM proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit should be issued as proposed.

Upon further review, the OAM has decided to make the following changes to the Part 70 Operating Permit. The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded)**:

1. The Cover Page has been revised as follows:

   Issued by:
   ~~Felicia R. George~~ **Janet G. McCabe**, Assistant Commissioner
   Office of Air Management

2. The page numbers have been removed from the table of contents since the condition numbers are sufficient to identify the location of each condition.

3. Section A (Source Summary) has been changed as follows:

   SECTION A SOURCE SUMMARY

   This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM)~~, and presented in the permit application~~. **The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.**

4. The sequence of emission units listed in Section A.2 has been changed to coincide with the order the units are addressed in Sections D.1 through D.7. The sequence of emission units in Section A.2 is now as listed below. Any changes to the specific equipment in the list is documented in this addendum. The equipment listed in Sections D.1 through D.7 are re-lettered accordingly.

(a) One (1) No. 11 A&P Annealing Furnace, identified as S001A, ~~constructed~~ **modified** in ~~1967~~ **1998**, fired by natural gas and using liquid propane gas as a backup fuel and exhausting to fugitive emission point P001, maximum capacity: 27 tons of steel per hour, and maximum heat input capacity: ~~42~~ **60** million British thermal units per hour.

(b) One (1) No. 12 A&P Annealing Furnace, identified as S002A, constructed in 1967, fired by natural gas and using liquid propane gas as a backup fuel and exhausting to fugitive emission point P005, maximum capacity: 27 tons of steel per hour, and maximum heat input capacity: 40 million British thermal units per hour.

(c) One (1) No. 11 A&P Line Jet Cool Unit, identified as S001B, constructed in 1981, using a baghouse identified as D001 as control, and exhausting to stack P002, maximum capacity: 27 tons of steel per hour.

(d) One (1) No. 11 A&P Line Shot Blast Unit, identified as S001C, constructed in 1967 and replaced in 1995, using a baghouse identified as D002 as control, and exhausting to stack P003, maximum capacity: 27 tons of steel per hour.

(e) One (1) No. 11 A&P Acid Pickling Facility, identified as ~~S001C~~ **S001D**, constructed in 1967, using a chemical scrubber identified as D003 as control, and exhausting to stack P004, maximum capacity: 27 tons of steel per hour.

(f) One (1) No. 12 A&P Kolene Rinse, identified as S002C, constructed in 1967 and replaced in 1996, using a chemical scrubber identified as D003 as control, and exhausting to stack P004, maximum capacity: 27 tons of steel per hour.

(g) One (1) No. 12 A&P Line Acid Pickling Facility, identified as S002D, constructed in 1967, using a chemical scrubber identified as D003 as control, and exhausting to stack P004, maximum capacity: 27 tons of steel per hour.

(h) One (1) North Boiler, identified as S006, installed in 1966, fired by natural gas, using liquid propane gas as a backup fuel and exhausting to stack P011, maximum heat input capacity: 20.92 million British thermal units per hour.

(i) One (1) Middle Boiler, identified as S007, installed in 1966, fired by natural gas using liquid propane gas as a backup fuel and exhausting to stack P012, maximum heat input capacity: 10.46 million British thermal units per hour.

(j) One (1) South Boiler, identified as S008, installed in 1966, fired by natural gas using liquid propane gas as a backup fuel and exhausting to stack P013, maximum heat input capacity: 10.46 million British thermal units per hour.

(k) One (1) Strip Grinder, identified as S003A, **composed of four (4) grinding heads and four (4) eliminators,** constructed in 1967, using oil mist eliminators identified as D004, D005 and D006 as control, and exhausting to stack P007, maximum capacity: 25 tons of steel per hour.

(l) One (1) Strip Polisher, identified as S003B, constructed in 1967, and exhausting to stack P008, maximum capacity: 25 tons of steel per hour.

(m) One (1) Z-Mill, identified as S004, constructed in 1967, using an oil mist eliminator identified as D007 as control, and exhausting to stack P009, maximum capacity: 35 tons of steel per hour.

(n) One (1) Temper Mill, identified as S005, constructed in 1967, and exhausting to fugitive emission point P010, maximum capacity: 50 tons of steel per hour.

(o) Three (3) Parts Cleaners, identified as S009A, constructed between 1980 and 1988, using a sealed reservoir as control, and exhausting to fugitive emission point P014, maximum throughput: 0.5 gallons of mineral spirits per hour.

(p) One (1) Parts Cleaner, identified as S009B, constructed between 1980 and 1988, using a sealed reservoir as control, and exhausting to fugitive emission point P015, maximum throughput: 0.5 gallons of kerosene per hour.

5. It has been determined that the requirements of 326 IAC 6-3-2 are not applicable to the annealing furnaces. Section D.1 for the annealing furnaces has been removed. Therefore, there is no Section D corresponding to items (a) and (b) in the equipment list. The remaining Section Ds have been re-numbered accordingly. The annealing furnaces must comply with all general provisions cited in Sections B and C of the permit.

6. Allegheny Ludlum submitted a New Source Review application on April 28, 1998 for an increase in the capacity of the No. 11 A&P Line Annealing Furnace from 42.0 million British thermal units per hour to 60.0 million British thermal units per hour.

(a) This increase will be permitted under CP 065-9719-00014. As illustrated in the TSD to CP 065-9719-00014, there are no rules specifically applicable to the annealing furnaces.

(b) As stated in CP 065-9719-00014, the conditions of that permit will be incorporated into the Title V operating permit.

(c) Changes to OP No. T 065-7593-00014 resulting from this construction permit are:

Section A.2 (a):

One (1) No. 11 A&P Annealing Furnace, identified as S001A, ~~constructed~~ **modified** in ~~1967~~ **1998**, fired by natural gas and using liquid propane gas as a backup fuel and exhausting to fugitive emission point P001, maximum capacity: 27 tons of steel per hour, and maximum heat input capacity: ~~42~~ **60** million British thermal units per hour.

There are no additional changes to the permit as a result of this change.

7. Condition A.3 (Specifically Regulated Insignificant Activities) has been revised as follows:

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]

This stationary source ~~does not currently have any~~ **also includes the following** insignificant activities which are specifically regulated, **as defined in 326 IAC 2-7-1(21)** ~~that have applicable NSPS or NESHAP requirements~~**:**

The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

As a result of this change, Section D.7 has been added to the permit. Section D.7 is as follows:

SECTION D.7 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] - Insignificant Activities

The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.7.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the brazing equipment, cutting torches, soldering equipment, and welding equipment shall not exceed allowable PM emission rate based on the following equations:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

or

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 55.0\ P^{0.11} - 4$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirement

D.7.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facilities are in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.7.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

8. Condition A.5 (Prior Permit Conditions Superceded) has been deleted. Language has been added to Condition B.14 (Permit Shield) to address the effect of prior permit conditions.

~~A.5 Prior Permit Conditions Superseded [326 IAC 2]~~

~~The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.~~

Section B

9. Condition B.1 (Permit No Defense) part (b) has been changed as follows:

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, **as set out in this permit in the Section B condition entitled "Permit Shield."**

10. Condition B.8 (Duty to Supplement and Provide Information) part (c) has been changed as follows:

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. **If the Permittee wishes to assert a claim of confidentiality over any of the furnished records,** ~~For information claimed to be confidential~~, the Permittee **must** ~~shall~~ furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, **to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records,** then the Permittee **must** ~~shall~~ furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

11. Condition B.11 (Annual Compliance Certification) part (c) has been changed to the following:

(c) The annual compliance certification report shall include the following:

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was **based on** continuous or intermittent **data**;

(4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); ~~and~~

(5) Any insignificant activity that has been added without a permit revision; and

~~(5)~~ **(6)** Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The ~~notification which shall be submitted~~ **submittal** by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

12. Condition B.12 (Preventive Maintenance Plan) has been changed as follows:

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each **facility**:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing ~~emission units and associated~~ emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

13. Condition B.14 (Permit Shield) has been changed as follows:

B.14 Permit Shield [326 IAC 2-7-15]

(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

~~(a)~~ **(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.** Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided **that** ~~either of the following:~~

(1) The applicable requirements are included and specifically identified in this permit; **or**

(2) ~~IDEM, OAM, in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary thereof.~~ **The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.**

~~(b)~~ **(c)** ~~No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.~~ **If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.**

~~(c)~~ **(d)** ~~If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.~~ **No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.**

~~(d)~~ **(e)** Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

~~(e)~~ **(f)** This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

~~(f)~~ **(g)** This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]

~~(g)~~ **(h)** This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

14. Condition B.16 (Deviations from Permit Requirements and Conditions) has been changed as follows:

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

~~(b)~~ **(c)** Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. **The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).**

~~(c)~~ **(d)** Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

15. Condition B.18 (Permit Renewal) part (a) has been changed as follows:

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) **and 326 IAC 2-7-1(40).**

16. Conditions B.19 (Administrative Permit Amendment), B.20 (Minor Permit Modification), and B.21 (Significant Permit Modification) have all been combined into a new Condition B.19 (Permit Amendment or Modification) as follows. Conditions B.20 and B.21 have been deleted and the remainder of Section B has been renumbered. The new B.19 condition reads as follows:

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

17. Condition B.26 (now B.24) (Inspection and Entry) has removed "IDEM", since Local Agencies do not have IDEM identification cards. Also, part (e)(1) and (e)(2) have been added.(only if not already there)

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of ~~IDEM~~ **proper** identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]

(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

(2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

18. Condition B.27 (now B.25) (Transfer of Ownership or Operation) part (b) has been changed as follows:

(b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. **The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

19. Condition B.28 (now B.26) (Annual Fee Payment) has been changed as follows:

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. ~~or in a time period consistent with the fee schedule established in 326 IAC 2-7-19.~~ **If the Permittee does not receive a bill from IDEM, OAM, the applicable fee is due April 1 of each year.**

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) ~~If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date,~~ The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. ~~The applicable fee is due April 1 of each year.~~

Section C

20. Condition C.1 has been changed as follows:

C.1 Major Source
Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) **and 40 CFR 52.21**, this source is a major source.

21. Condition C.2 (Particulate Matter Emission Limitations for Processes with Process Weight Rates Less Than One Hundred pounds per hour) has been added and the remaining conditions have been renumbered accordingly.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

22. Condition C.2 (now C.3) has been revised as follows:

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (~~Visible Emissions~~ **Opacity** Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), ~~visible emissions~~ opacity shall meet the following, unless otherwise stated in this permit:

(a) ~~Visible emissions~~ **Opacity** shall not exceed an average of forty percent (40%) ~~opacity~~ in ~~twenty-four (24) consecutive readings~~, **any one (1) six (6) minute averaging period** as determined in 326 IAC 5-1-4.

(b) ~~Visible emissions~~ **Opacity** shall not exceed sixty percent (60%) ~~opacity~~ for more than a cumulative total of fifteen (15) minutes (sixty (60) readings **as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor)** in a six (6) hour period.

23. Condition C.6 (now C.7) (Operation of Equipment) has been changed as follows:

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit **and used to comply with an applicable requirement** shall be operated at all times that the emission units vented to the control equipment are in operation. ~~as described in Section D of this permit.~~

24. Condition C.7 (now C.8) (Asbestos Abatement Projects- Accreditation) and Condition C.14 (Asbestos Abatement Projects) have been combined into one condition as follows:

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility

components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

25. Condition C.8 (now C.9) (Performance Testing) has had the rule cite changed to 326 IAC 3-6 and the following language has been added:

C.9 Performance Testing ~~[326 IAC 3-2.1]~~ **[326 IAC 3-6]**

(a) All testing shall be performed according to the provisions of 326 IAC ~~3-2.1~~ **3-6** (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days ~~before~~ **prior to** the intended test date. **The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.**

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

26. Condition C.9 (now C.10) (Compliance Schedule) has been changed as follows:

C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

(a) **Has certified that all facilities at this source are in compliance with all applicable requirements; and** ~~Will continue to comply with such requirements that become effective during the term of this permit; and~~

(b) Has submitted a statement that the Permittee will continue to comply with such requirements; and

(c) **Will comply with such applicable requirements that become effective during the term of this permit.** ~~Has certified that all facilities at this source are in compliance with all applicable requirements.~~

27. Condition C.10 (now C.11) (Compliance Monitoring) has been changed as follows:

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee **may extend compliance schedule an additional ninety (90) days provided the Permittee** ~~shall~~ notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, **prior to the end of the initial ninety (90) day compliance schedule** ~~**no more than ninety** after receipt of this permit~~, with full justification of the reasons for the inability to meet this date. ~~and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.~~

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

28. Condition C.12 (now C.13) (Monitoring Methods) has been changed as follows:

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the **applicable** requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

29. Condition C.14 (Asbestos Abatement Projects) has been deleted and has been incorporated into the revised Condition C.8 (Asbestos Abatement Projects).

~~C.14 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]~~

~~(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos-containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.~~

~~(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:~~

~~(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or~~

~~(2) If there is a change in the following:~~

~~(A) Asbestos removal or demolition start date;~~

~~(B) Removal or demolition contractor; or~~

~~(3) Waste disposal site.~~

~~(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).~~

~~(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).~~

~~All required notifications shall be submitted to:~~

~~Indiana Department of Environmental Management~~
~~Asbestos Section, Office of Air Management~~
~~100 North Senate Avenue, P.O. Box 6015~~
~~Indianapolis, Indiana 46206-6015~~

~~(e) Procedures for Asbestos Emission Control~~
~~The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.~~

~~(f) Indiana Accredited Asbestos Inspector~~
~~The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.~~

30. Condition C.15 (Emergency Reduction Plans) part (b) has been changed as follows:

(b) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. **The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

31. Condition C.16 (Risk Management Plan) has been changed as follows:

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present **in a process** in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

32. Condition C.17 (Compliance Monitoring Plan - Failure to Take Response Steps) has had the following rule cite changes:

Condition C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5~~(3)~~]**[326 IAC 2-7-6] [326 IAC 1-6]**

33. Condition C.18 (Actions Related to Noncompliance Demonstrated by a Stack Test), has had the rule cites added to the title and following language added:

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test **[326 IAC 2-7-5] [326 IAC 2-7-6]**

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

34. Condition C.19 (Emission Statement) part (a) has been changed as follows:

(a) The Permittee shall submit a**n** ~~certified,~~ annual emission statement **certified pursuant to the requirements of 326 IAC 2-6**, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

35. Condition C.21 (General Record Keeping Requirements) has been changed as follows:

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)~~(B)~~]**[326 IAC 2-7-6]**

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location **for a minimum of three (3) years** and available **upon the request** ~~within one (1) hour upon verbal request~~ of an IDEM, OAM, representative~~, for a minimum of three (3) years~~. ~~They~~ **The records** may be stored elsewhere for the remaining two (2) years **as long as they are available upon request** ~~providing they are made available within thirty (30) days after written request.~~ **If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.**

36. Condition C.22 (General Reporting Requirements) has had the word “Quality” changed to “Quarterly”, and the following language has been added:

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) To affirm that the source has met all the **compliance monitoring** requirements stated in this permit the source shall submit a ~~Quality~~ **Quarterly** Compliance **Monitoring** Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

(e) All instances of deviations **as described in Section B- Deviations from Permit Requirements Conditions** must be clearly identified in such reports. ~~A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:~~

~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~

~~(2) An emergency as defined in 326 IAC 2-7-1(12); or~~

~~(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.~~

~~(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.~~

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

37. Section D (Facility Operation Conditions) has had the following language added to the facility description box in all Section Ds:

Facility Description [326 IAC 2-7-5(15)]

38. Conditions D.2.3 (now D.1.3), D.3.3 (now D.2.3), D.4.2 (now D.3.2), D.5.3 (now D.4.3), D.6.3 (now D.5.3), and D.7.3 (now D.6.3) (Testing Requirements) have been changed as follows:

D.1.3 Testing Requirements [326 IAC 2-7-6(1),**(6)**]

~~Testing of~~ **The Permittee is not required to test** these facilities ~~is not specifically required~~ by this permit. However, **IDEM may require compliance testing at any specific time when necessary to determine if the facilities are in compliance.** If testing is required **by IDEM**, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. ~~This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

D.2.3 Testing Requirements [326 IAC 2-7-6(1),**(6)**]

~~Testing of~~ **The Permittee is not required to test** these facilities ~~is not specifically required~~ by this permit. However, **IDEM may require compliance testing at any specific time when necessary to determine if the facilities are in compliance.** If testing is required **by IDEM**, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. ~~This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

D.3.2 Testing Requirements [326 IAC 2-7-6(1),**(6)**]

~~Testing of~~ **The Permittee is not required to test** these facilities ~~is not specifically required~~ by this permit. However, **IDEM may require compliance testing at any specific time when necessary to determine if the facilities are in compliance.** If testing is required **by IDEM**, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. ~~This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

D.4.3 Testing Requirements [326 IAC 2-7-6(1),**(6)**]

~~Testing of~~ **The Permittee is not required to test** these facilities ~~is not specifically required~~ by this permit. However, **IDEM may require compliance testing at any specific time when necessary to determine if the facilities are in compliance.** If testing is required **by IDEM**, compliance with the PM limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. ~~This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

D.5.3 Testing Requirements [326 IAC 2-7-6(1),**(6)**]

~~Testing of~~ **The Permittee is not required to test** these facilities ~~is not specifically required~~ by this permit. However, **IDEM may require compliance testing at any specific time when necessary to determine if the facilities are in compliance.** If testing is required **by IDEM**, compliance with the PM limit specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. ~~This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

39. Condition D.7.3 (Testing Requirements), which would now be Condition D.6.3, has been removed since there is no limitation on the parts cleaners with which to determine compliance.

~~D.7.3 Testing Requirements [326 IAC 2-7-6(1)]~~

~~Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the limit specified in Condition D.7.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

40. Conditions D.2.5(a) (now D.1.5(a)), D.3.6(a) (now D.2.6(a)), D.5.7(a) (now D.4.7(a)), and D.6.7(a) (now D.5.7(a)) (Visible Emission Notations) have been changed as follows.

(a) Daily visible emission notations of the No. 11 A&P Line Jet Cooler and No. 11 A&P Line Shot Blast Unit (S001B and S001C) stacks (P002 and P003) exhaust shall be performed during normal daylight operations **when exhausting to the atmosphere**. A trained employee shall record whether emissions are normal or abnormal.

(a) Daily visible emission notations of the No. 11 A&P Line Acid Pickling, No. 12 A&P Line Acid Pickling, and No. 12 A&P Line Kolene Rinse (S001D, S002D and S002C) stack (P004) exhaust shall be performed during normal daylight operations **when exhausting to the atmosphere**. A trained employee shall record whether emissions are normal or abnormal.

(a) Daily visible emission notations of the Strip Grinder stack exhaust (P007) shall be performed during normal daylight operations **when exhausting to the atmosphere**. A trained employee shall record whether emissions are normal or abnormal.

(a) Daily visible emission notations of the Z-Mill stack (P009) exhaust shall be performed during normal daylight operations **when exhausting to the atmosphere**. A trained employee shall record whether emissions are normal or abnormal.

41. Condition D.2.7 (now D.1.8) (Broken Bag or Failure Detection) has been changed as follows.

D.1.8 Broken Bag or ~~Failure~~ **Failed Bag** Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. **Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

(b) ~~Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.~~ **For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

42. A condition requiring the parametric monitoring of baghouses D001 and D002 controlling the No. 11 A&P Line Jet Cooler and No. 11 A&P Line Shot Blast Unit, respectively, has been added to Section D.2 (now Section D.1). The Condition is numbered D.1.7. The remainder of Section D.2 (now D.1) has been re-numbered accordingly. Condition D.1.7 states:

The Permittee shall record the total static pressure drop across baghouses D001 and D002 used in conjunction with the No. 11 A&P Line Jet Cooler and No. 11 A&P Line Shot Blast Unit, at least once per day when the No. 11 A&P Line Jet Cooler and No. 11 A&P Line Shot Blast Unit are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

As a result of this change, Condition D.2.8 (now D.1.9) has been revised as follows:

(a) To document compliance with Condition ~~D.2.1~~ D.1.1 and ~~D.2.5~~ D.1.5, the Permittee shall maintain records of daily visible emission notations of the No. 11 A&P Line Jet Cooler and No. 11 A&P Line Shot Blast Unit (S001B and S001C) stack exhausts.

(b) To document compliance with Condition ~~D.2.1~~ D.1.1, the Permittee shall maintain records of the results of the inspections required under Condition ~~D.2.6~~ D.1.6 and the dates the vents are redirected.

(c) **To document compliance with Condition D.1.7, the Permittee shall maintain the following:**

(1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle: frequency and differential pressure.

(2) Documentation of all response steps implemented, per event.

(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(8) Documentation of the dates vents are redirected.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

43. As indicated in IDEM change (4), item (k) of Condition A.2 and the Facility Description in Section D.5 (now D.4) has been revised to be more precise as follows:

(k) One (1) Strip Grinder, identified as S003A, **composed of four (4) grinding heads and four (4) eliminators,** constructed in 1967, using oil mist eliminators identified as D004, D005 and D006 as control, and exhausting to stack P007, maximum capacity: 25 tons of steel per hour.

Forms

44. In the Certification Form, the words “Emergency/Deviation Occurrence Reporting Form” have been deleted as shown in form as follows.

45. The Quarterly Compliance Report is now called the Quarterly Compliance Monitoring Report, the column marked “No Deviations” has been deleted and the language has been changed as indicated in the following pages.

46. The Emergency/Deviation Occurrence Reporting Form has had the phrase “Attach a signed certification to complete this report” deleted from the bottom of the second page. The changes are shown in the following pages.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Allegheny Ludlum Corporation
Source Address: State Route 38 West, New Castle, Indiana 47364
Mailing Address: State Route 38 West, New Castle, Indiana 47362
Part 70 Permit No.: T 065-7593-00014

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

~~**9** Emergency/Deviation Occurrence Reporting Form~~

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

~~Attach a signed certification to complete this report.~~

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Allegheny Ludlum Corporation
Source Address: State Route 38 West, New Castle, Indiana 47364
Mailing Address: State Route 38 West, New Castle, Indiana 47362
Part 70 Permit No.: T 065-7593-00014

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the **compliance monitoring** requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the **compliance monitoring** requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/ Deviation Occurrence Report. If no deviations occurred, please specify ~~zero in the column marked "No Deviations".~~ **in the box marked "No deviations occurred this reporting period".**

9 **NO DEVIATIONS OCCURRED THIS REPORTING PERIOD**

9 **THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.** ~~LIST EACH COMPLIANCE MONITORING REQUIREMENT EXISTING FOR THIS SOURCE:~~

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	**Number of Deviations**	**Date of each Deviations**	~~**No Deviations**~~

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

On, April 24, 1998, Deborah L. Calderazzo of Allegheny Ludlum, submitted comments on the proposed Part 70 Operating Permit. The comments are as follows:

Comment 1:

The acid fume scrubber which controls emissions from the No. 11 Anneal and Pickle (A&P) Line Acid Pickling and No. 12 A&P Line Acid Pickling and Kolene units is equipped with a Dwyer Instrument, Inc. capsuphotohelic-type pressure gauge. The capsuphotohelic pressure gauge has an accuracy of ±3% of full scale at 70EF. Accordingly, Allegheny Ludlum requests that Condition C.13 - Pressure Gauge Specifications be revised as follows:

"Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal operating reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus three percent (3%) of full scale reading."

Response 1:

Condition C.13 (now C.14) (Pressure Gauge Specifications) has been revised as follows:

> Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus ~~two percent (±2%)~~ **three percent (±3%)** of full scale reading.

Comment 2:

Section D.1 specifies emission limitations and compliance determination requirements for the No. 11 and No. 12 Anneal and Pickle (A&P) Line Annealing Furnaces. The subject particulate matter limitations and testing requirements are not applicable, since combustion products from both furnaces are emitted to the atmosphere as fugitive emissions. Furthermore, the configuration of both furnaces prevents demonstration of compliance with the subject particulate matter limitations using testing.

Response 2:

As indicated in IDEM change (5), the requirements of 326 IAC 6-3-2 are not applicable to the annealing furnaces. Section D.1 for the annealing furnaces has been removed. Although emissions do not exhaust through a stack, the emissions are considered point source emissions. Point source emissions are not considered fugitive emissions for the purpose of this review. The annealing furnaces must comply with all general provisions cited in Sections B and C of the permit.

Comment 3:

The identification number for the No. 11 A&P Line Acid Pickling Unit in Section A, Item A.2(c) on Page 6 of 50 and in Section D.3 on Page 34 of 50 is incorrect. The subject unit is identified as source number "S001D," not "S001C."

Response 3:

This error has been corrected as follows:

> One (1) No. 11 A&P Acid Pickling Facility, identified as ~~S001C~~ **S001D**, constructed in 1967, using a chemical scrubber identified as D003 as control, and exhausting to stack P004, maximum capacity: 27 tons of steel per hour.

Comment 4:

The proposed parametric monitoring requirements set forth in Section D.3.7 are unnecessary, are overly burdensome and unreasonable, and do not provide any additional environmental benefit beyond our current procedures. Specifically, the proposed parametric monitoring frequency will unfairly burden the New Castle Plant and may significantly increase operating costs. Increased operating costs adversely affect Allegheny Ludlum Corporation's ability to maintain its cost-effectiveness in the extremely competitive specialty steel industry. The Preventive Maintenance Plan prepared for the wet chemical scrubber (D003) is sufficient to meet the requirements set forth in 326 IAC 2-7-6(1). Therefore, Allegheny Ludlum is requesting that the parametric monitoring frequency be revised to require data to be taken <u>one per day</u> instead of once per working shift.

Response 4:

Operation Condition D.3.7 (now D.2.7) has been revised as follows:

> The Permittee shall take pressure, scrubbing liquid (water) flow rate, and recirculation pH readings from the wet chemical scrubber controlling the No. 11 A&P Line Acid Pickling, No. 12 A&P Line Acid Pickling and No. 12 A&P Line Kolene Rinse (S001D, S002D, and S002C), at least once per ~~working shift~~ **day** when either **of** the facilities are in operation when venting to the atmosphere. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the wet chemical scrubber (D003) shall be maintained within the range of 2 to 10 inches of water and the flow rate for scrubbing liquid shall be maintained above 200 gallons of water per minute or within a range and flow rate established during the latest stack test. The recirculation pH shall be maintained above 9.0. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.
>
> The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

Comment 5:

Section D.3.9(a) is not applicable. Cause A-3586 does not require Allegheny Ludlum to prepare or submit an annual summary of particulate matter emissions from the No. 11 and No. 12 A&P Lines Acid Pickling Units or the No. 12 A&P Line Kolene Unit. A summary of particulate matter emissions from these units will be submitted as part of our annual emissions statement. Cause A-3586, Section II, Paragraph 1.(b) requires that we submit quarterly visible emissions self-monitoring reports within thirty (30) days of the end of the calendar quarter in which the monitoring occurred. Therefore, Section D.3.9(a) should be deleted.

Response 5:

Cause A-3586 does not require Allegheny Ludlum to prepare or submit an annual summary of particulate matter emissions from the No. 11 and No. 12 A&P Lines Acid Pickling Units or the No. 12 A&P Line Kolene Unit. Therefore, Condition D.3.9(a) has been removed. A summary of particulate matter emissions from these units will be submitted as part of the annual emissions statement.

Comment 6:

Condition D.6.2 suggests that a Preventive Maintenance Plan is required for the Temper Mill. The Temper Mill is a fugitive emission unit and emits volatile organic compounds (VOCs) due to the evaporation of rolling solutions applied to specialty steel sheet. Since there is no air pollution control equipment associated with the Temper Mill, the requirements of 326 IAC 1-6 (regarding the malfunction of air pollution control equipment) are not applicable and, as such, a Preventive Maintenance Plan is not required.

Response 6:

(a) Although the Temper Mill emissions do not exhaust through a stack, the emissions are considered point source emissions. Therefore, the emissions are not considered fugitive for the purpose of this review.

(b) Since there are no rules applicable to the Temper Mill, a Preventive Maintenance Plan is not required. Condition D.6.2 (now D.5.2) has been revised as follows:

> A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the Z-Mill and its control device ~~and for the Temper Mill~~.

Comment 7:

As we indicated in our December 29, 1997 letter, the New Castle Plant operates four (4) parts cleaners. These parts cleaners use solvent for routine cleaning and maintenance of small parts and equipment. This maintenance activity is not an integral part of the manufacture and finishing of specialty steel. These units are used for maintenance purposes only and, as such, are “trivial or insignificant sources.”

Form GSD-10(a) of the Part 70 (Title V) Operating Permit Application provides a listing of trivial activities that do not need to be included in the application and/or operating permit. Included in this list are activities related to the routine maintenance of buildings, structures, equipment or vehicles at the source such as painting and solvent use (excluding degreasing operation utilizing halogenated organic solvents). Since the subject parts cleaners are utilized for maintenance purposes only and do not utilize halogenated organic solvents, they are trivial and/or insignificant sources. Accordingly, Allegheny Ludlum is requesting that the parts cleaners (S009A and S009B) be eliminated from the Part 70 Operating Permit.

Response 7:

Since the four (4) parts cleaners were not listed on the Form GSD-10(a) provided with the application and the VOC emissions based on the usage rates provided are greater than 15 pounds per day, the four (4) parts cleaners are not considered insignificant activities. Even if these four (4) parts cleaners are considered insignificant activities, they are regulated by state rules, specifically 326 IAC 8-3-2, Organic Solvent Degreasing Operations. Therefore, the four (4) parts cleaners would remain in the permit, along with Condition D.7.1 (now D.6.1). Condition D.7.3 (Testing Requirements) has been removed as indicated in IDEM change (38).

Comment 8:

Section D of the draft Part 70 Operating Permit proposes various compliance monitoring requirements for the following units and associated air pollution control equipment:

- No. 11 A&P Line Jet Cooler and Shot Blast Units (Section D.2)
- No. 11 and No. 12 A&P Lines Acid Pickling and No. 12 A&P Line Kolene Units (Section D.3)
- Strip Grinder and Polisher Units (Section D.5)
- Z-Mill and Temper Mill (Section D.6)

In general, the proposed compliance monitoring requirements for each of these units are overly burdensome and unreasonable. The proposed compliance monitoring requirements will unfairly burden the New Castle Plant and may significantly increase operating costs. Increased operating costs adversely affect Allegheny Ludlum Corporation's ability to maintain its cost-effectiveness in the extremely competitive specialty steel industry. Our specific objections are discussed in the following paragraphs.

The proposed compliance monitoring requirements are unnecessary and do not provide any additional environmental benefit beyond our current procedures. The Preventive Maintenance Plan prepared for each of our emission units is sufficient to meet the requirements set forth in 326 IAC 2-7-6(1). Since emissions from each of the affected units listed above are significantly less than applicable emissions limitations, the "enhanced" compliance monitoring requirements proposed in the draft Part 70 Operating Permit should not be required. We are proposing to demonstrate compliance with applicable emissions limitations by recording pertinent operating data and calculating emissions utilizing US EPA emission factors and other site specific emission estimates.

Furthermore, the proposed compliance monitoring/parametric monitoring frequency requirements of once per working shift during normal daylight operations is overly burdensome and confusing. Where applicable (i.e., parametric monitoring of the wet chemical scrubber), Allegheny Ludlum Corporation is requesting that daily-monitoring requirements be performed "once per day during the daylight shift."

The proposed compliance monitoring requirements are redundant. Section B.12 of the draft Part 70 Operating Permit requires Allegheny Ludlum to develop and implement a Preventive Maintenance Plan for each affected unit. A copy of the plan was submitted as part of our Part 70 (Title V) Operating Permit Application. In general, the plan summarizes various inspection and monitoring programs we have implemented at the New Castle Plant for air pollution control equipment associated with each affected unit. The Preventive Maintenance Plan prepared pursuant to 326 IAC 2-7-5(13) is sufficient to meet Compliance Monitoring Requirements pursuant to 326 IAC 2-7-6(1) and 326 IAC 2-7-5(1).

The proposed compliance monitoring requirements are not consistent with US EPA's Compliance Assurance Monitoring (CAM) program. In accordance with 40 CFR 64, Allegheny Ludlum will not be required to comply with applicable CAM requirements until our Part 70 Operating Permit is renewed. Since our Part 70 Operating Permit has not been issued, our renewal application may not be submitted for a least several years. We believe it is unfair to require the New Castle Plant to perform the proposed compliance monitoring requirements for the term of this permit only to have different requirements established during the renewal process. As such, Allegheny Ludlum is proposing to continue to operate in accordance with its existing Preventive Maintenance Plan and other applicable requirements until US EPA's CAM program is applicable.

Response 8:

(a) The Parametric Monitoring Conditions have been revised to require readings once per day. The change to D.3.7 (now D.2.7) is documented in Response 4. The wording of the Parametric Monitoring Condition D.1.7 is indicated in IDEM change (42).

(b) The visible emission notations are used to indicate compliance with 326 IAC 5-1 and 326 IAC 6, without the requirement to have a person on site trained in opacity measurement. This requirement is designed as a trigger that the source perform some corrective action on the facility if visible emissions are abnormal, to ensure continuous compliance with emission limitations. These conditions will not be removed from the permit.

(c) The baghouse inspection requirement of Condition D.2.6 (now D.1.6) and the oil mist eliminator inspections of Conditions D.5.5 (now D.4.5) and D.6.5 (now D.5.5) are consistent with the Preventive Maintenance Plans submitted with the application. IDEM, OAM, requires that inspections and/or parametric monitoring be specified in the permit so that sufficient monitoring takes place to ensure continuous compliance with emission limitations and to prompt timely corrective actions.

(d) There are no changes to Sections D.2 (now D.1), D.5 (now D.4), and D.6 (now D.5) as a result of this comment.

(e) Note that there are no compliance monitoring conditions applicable to the Strip Polisher and the Temper Mill.

Comment 9:

Section C.22 is redundant and unreasonable. In accordance with Section B.11 and 326 IAC 2-7-6(5), Allegheny Ludlum is required to submit an annual compliance certification to IDEM and US EPA. In general, this certification should include the following:

- the terms or conditions of the permit
- the facility's compliance status with respect to the terms or Conditions of the permit
- whether compliance was continuous or intermittent
- the methods used for demonstrating compliance with the terms or conditions of the permit

Section C.22 requires that we submit similar information to IDEM on a quarterly basis. This is unnecessary and overly burdensome. Since Sections B.11 and C.22 require the submission of similar information regarding applicable requirements and methods of demonstrating compliance, we request that Section C.22 be eliminated. With respect to reporting, as set forth in 326 IAC 2-7-5 (3)(C), a Part 70 permit shall incorporate all applicable reporting requirements and require submittal

of reports of any required monitoring at least every six (6) months. It further states that a responsible official must certify all reports required to be submitted. Therefore, the information required by the subject conditions should be consolidated into one (1) report and/or certification which should be submitted to IDEM and US EPA once every six (6) months.

Response 9:

Pursuant to 326 IAC 2-7-5(3)(C)(i), with respect to monitoring, a Part 70 permit shall incorporate all applicable reporting requirements or alternative requirements established in section 24 or 25 of 326 IAC 2-7-5 and require the submittal of reports of any required monitoring at least every six (6) months. IDEM, OAM has revised Condition C.22 to specify that this report is only required for compliance monitoring requirements. Condition C.22 has been revised as indicated in IDEM change (36). and Condition B.11 has been revised as indicated in IDEM change (11).

Comment 10:

In addition, please be advised that we have recently submitted a construction application for approval to modify No. 11 A&P Line Annealing Furnace (S001A). The modification will increase the rated heat input capacity of the furnace from approximately 42 MMBtu/hour to approximately 60 MMBtu/hour.

Response 10:

See IDEM, OAM, change (6).

Appendix A: Emissions Calculations
Potential Emissions

Company Name: **Allegheny Ludlum Corporation**
Address City IN Zip: **State Route 38 West, New Castle, IN 47362**
Part 70 OP: **065-7593**
Plt ID: **065-00014**
Reviewer: **Carrie Ann Ortolani**
Date: **December 12, 1996**

S001B No. 11 A&P Line Jet cooler unit

Capacity tons/hr	Control* efficiency (%)
27	99.0%

Baghouse

* Control efficiency for PM10 is 98.5%

	Pollutant					
	PM	PM10	Chromium	Manganese	Nickel	PM allowable
Emission Factor in lb/ton	5.1	3.1	0.003	0.012	0.034	
Potential Emission in lbs/hr	137.7	83.7	0.081	0.324	0.918	37.3
Potential Emission in tons/yr	603	367	0.355	1.42	4.02	
Emissions after controls in lbs/hr	1.38	1.26	0.001	0.003	0.009	37.3
Emissions after controls in tons/yr	6.03	5.50	0.004	0.014	0.040	

S001C No. 11 A&P Line Shot Blast Unit

Capacity tons/hr	Control* efficiency (%)
27	99.0%

Baghouse

* Control efficiency for PM10 is 98.5%

	Pollutant					
	PM	PM10	Chromium	Manganese	Nickel	PM allowable
Emission Factor in lb/ton	4.8	2.9	0.046	0.027	0.192	
Potential Emission in lbs/hr	129.6	78.3	1.242	0.729	5.184	37.3
Potential Emission in tons/yr	568	343	5.440	3.19	22.71	
Emissions after controls in lbs/hr	1.30	1.17	0.012	0.007	0.052	37.3
Emissions after controls in tons/yr	5.68	5.14	0.054	0.032	0.227	

S001D No. 11 A&P Line Acid Pickling

Capacity tons/hr	Control* efficiency (%)	
27	99.0%	Wet Chemical Scrubber

* Control efficiency for NOx is 45%

	Pollutant				
	PM	PM10	NOx	HF	PM allowable
Emission Factor in lb/ton	0.9	0.9	2.112	0.01	
Potential Emission in lbs/hr	24.3	24.3	57.0	0.270	37.3
Potential Emission in tons/yr	106	106	250	1.18	
Emissions after controls in lbs/hr	0.243	0.243	31.4	0.003	37.3
Emissions after controls in tons/yr	1.06	1.06	137	0.012	

S002C No. 12 A&P Line Kolene Rinse

Capacity tons/hr	Control efficiency (%)	
27	99.0%	Wet Chemical Scrubber

	Pollutant			
	PM	PM10	Chromium	PM allowable
Emission Factor in lb/ton	3	1.8	0.03	
Potential Emission in lbs/hr	81.0	48.6	0.810	37.3
Potential Emission in tons/yr	355	213	3.55	
Emissions after controls in lbs/hr	0.810	0.486	0.008	37.3
Emissions after controls in tons/yr	3.55	2.13	0.035	

S002D No. 12 A&P Line Acid Pickling

Capacity tons/hr	Control* efficiency (%)	
27	99.0%	Wet Chemical Scrubber

* Control efficiency for NOx is 45%

	Pollutant				
	PM	PM10	NOx	HF	PM allowable
Emission Factor in lb/ton	0.9	0.9	2.112	0.1	
Potential Emission in lbs/hr	24.3	24.3	57.0	2.7	37.3
Potential Emission in tons/yr	106	106	250	11.8	
Potential Emission in lbs/hr	0.243	0.243	31.4	0.027	37.3
Potential Emission in tons/yr	1.06	1.06	137	0.118	

S003A Strip Grinder

Capacity tons/hr	Control efficiency (%)
25	90.0%

Mist Eliminator

	Pollutant		
	PM	PM10	PM allowable
Emission Factor in lb/ton	1.3	0.7	
Potential Emission in lbs/hr	32.5	17.5	35.4
Potential Emission in tons/yr	142	77	
Emissions after controls in lbs/hr	3.25	1.75	35.4
Emissions after controls in tons/yr	14.2	7.67	

S003B Strip Polisher

Capacity tons/hr	Control efficiency (%)
25	0.0%

	Pollutant		
	PM	PM10	PM allowable
Emission Factor in lb/ton	0.1	0.1	
Potential Emission in lbs/hr	2.50	2.50	35.4
Potential Emission in tons/yr	11.0	11.0	
Emissions after controls in lbs/hr	2.50	2.50	35.4
Emissions after controls in tons/yr	11.0	11.0	

S004 Z-Mill

Capacity tons/hr	Control* efficiency (%)
35	60.0%

Mist Eliminator

* Control efficiency for VOC is 0%

	Pollutant			
	PM	PM10	VOC	PM allowable
Emission Factor in lb/ton	0.9	0.9	0.00003	
Potential Emission in lbs/hr	31.5	31.5	0.00105	41.3
Potential Emission in tons/yr	138	138	0.005	
Emissions after controls in lbs/hr	12.6	12.6	0.001	41.3
Emissions after controls in tons/yr	55.2	55.2	0.005	

S005 Temper Mill

Capacity tons/hr	Control efficiency (%)
50	0.0%

	Pollutant		
	Methanol	MIBK	VOC
Emission Factor in lb/ton	0.03	0.02	0.9
Potential Emission in lbs/hr	1.50	1.00	45.0
Potential Emission in tons/yr	6.57	4.38	197
Emissions after controls in lbs/hr	1.50	1.00	45.0
Emissions after controls in tons/yr	6.57	4.38	197

Totals	PM	PM10	VOC	NOx
Potential Emissions tons/yr	2030	1361	197	500
Emissions after controls tons/yr	97.8	88.7	197	275

Total HAP emissions	Methanol	MIBK	Chromium	Manganese	Nickel	HF
Potential Emissions tons/yr	6.57	4.38	9.34	4.61	26.7	13.0
Emissions after controls tons/yr	6.57	4.38	0.093	0.046	0.267	0.130
Emissions after controls lbs/hr	1.50	1.00	0.021	0.011	0.061	0.030
Emissions after controls g/sec	0.189	0.126	0.003	0.001	0.008	0.004

The emission factors were computed by the applicant using stack test data and mass balance calculations.

Appendix A: State Potential Emissions Calculations
VOC and Particulate
Parts Cleaning Operations

Company Name: **Allegheny Ludlum Corporation**
Address City IN Zip: **State Route 38 West, New Castle, IN 47362**
Part 70 OP: **065-7593**
Plt ID: **065-00014**
Reviewer: **Carrie Ann Ortolani**
Date: **December 12, 1996**

Material	Density (lb/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential tons per year	lb VOC /gal solids	Transfer Efficiency
Parts Cleaners																
S009A																
Safety-Kleen 105 Solvent-MS	6.6	100.00%	0.0%	100.0%	0.0%	0.00%	0.50000	1.000	6.63	6.63	3.32	79.56	14.52	0.00	N/A	100%
S009B																
Kerosene	6.8	100.00%	0.0%	100.0%	0.0%	0.00%	0.50000	1.000	6.80	6.80	3.40	81.60	14.89	0.00	N/A	100%
State Potential Emissions			**Add worst case coating to all solvents**								**6.72**	**161**	**29.4**	**0.00**		

Control Technology Emissions (Combustion)																
						Emission Factors							Emissions			
Type	Number	Capacity	Gas usage	PM	PM10	SO2	NOx	VOC	CO		PM	PM10	SO2	NOx	VOC	CO
		MMBtu/hr	MMCF/yr	lb/MMCF	lb/MMCF	lb/MMCF	lb/MMCF	lb/MMCF	lb/MMCF		tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr
Catalytic			0.0	3.0	3.0	0.6	100.0	5.3	35.0		0.0	0.0	0.0	0.0	0.0	0.0
Thermal			0.0	3.0	3.0	0.6	140.0	2.8	20.0		0.0	0.0	0.0	0.0	0.0	0.0
Total			0.0								0.0	0.0	0.0	0.0	0.0	0.0
										Control Efficiency		Controlled	Controlled	Controlled	Controlled	
										VOC	PM	VOC pounds	VOC pounds	VOC	Particulate	
										0.80	**0.00**	per hour	per day	tons/yr	tons/yr	
Controlled Emissions due to Surface Coating Operations and Controls												**1.34**	**32.2**	**5.88**	**0.00**	

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * Flash-off
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day) * Flash-off
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs) * Flash-off
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Flash-off
Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations
Natural Gas Combustion Only
10 < MM BTU/HR <100
Small Industrial Boiler

Company Name: Allegheny Ludlum Corporation
Address City IN Zip: State Route 38 West, New Castle, IN 47362
Part 70 OP: 065-7593
Plt ID: 065-00014
Reviewer: Carrie Ann Ortolani
Date: December 12, 1996

S001A Annealing furnace

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Potential Throughput tons/yr
42.0	367.9	236520

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Combustion Emission Factor in lb/MMCF	13.7	13.7	0.6	164.0	2.8	35.0
Process Emission Factor in lb/ton	0.0	0.0	0.0	0.0	0.1	0.0
Potential Emission in tons/yr	2.52	2.52	0.110	30.2	12.3	6.44

S002A Annealing furnace

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Potential Throughput tons/yr
40.0	350.4	236520

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Combustion Emission Factor in lb/MMCF	13.7	13.7	0.6	164.0	2.8	35.0
Process Emission Factor in lb/ton	0.0	0.0	0.0	0.0	0.1	0.0
Potential Emission in tons/yr	2.40	2.40	0.105	28.7	12.3	6.13

S006 North Boiler

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
20.9	183.3

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	13.7	13.7	0.6	140.0	2.8	35.0
Potential Emission in tons/yr	1.26	1.26	0.055	12.8	0.257	3.21

S007 Middle Boiler

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
10.5	91.6

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	13.7	13.7	0.6	140.0	2.8	35.0
Potential Emission in tons/yr	0.628	0.628	0.027	6.41	0.128	1.60

S008 South Boiler

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
10.5	91.6

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	13.7	13.7	0.6	140.0	2.8	35.0
Potential Emission in tons/yr	0.628	0.628	0.027	6.41	0.128	1.60

	PM	PM10	SO2	NOx	VOC	CO
Total Potential Emissions in tons/yr	7.43	7.43	0.325	84.6	25.2	19.0

Methodology:
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors for NOx: Uncontrolled = 164, Low NOx Burner = 81, Flue gas recirculation = 30
Emission Factors for CO: Uncontrolled = 35, Low NOx Burner = 61, Flue gas recirculation = 37
Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Potential Throughput (tons/yr) = 27 tons/hr x 8,760 hrs/yr
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, (SCC #1-02-006-02), and applicant supplied factors
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton + Throughput (tons/yr) x Emission Factor (lb/ton)/2,000 lb/ton

Appendix A: Emission Calculations
LPG-Propane (alternate fuel possibility)
10 < MM BTU/HR <100
Small Industrial Boiler

Company Name: Allegheny Ludlum Corporation
Address City IN Zip: State Route 38 West, New Castle, IN 47362
Part 70 OP: 065-7593
Plt ID: 065-00014
Reviewer: Carrie Ann Ortolani
Date: December 12, 1996

S001A Annealing furnace

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	SO2 Emission factor = 0.10 x S S = Weight % Sulfur =	Potential Throughput tons/yr
42.0	3914	0.000123	236520

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Combustion Emission Factor in lb/kga	0.6	0.6	0.00001 *(0.10S)*	19.0	0.5	3.2
Process Emission Factor in lb/ton	0.0	0.0	0.0	0.0	0.1	0.0
Potential Emission in tons/yr	1.17	1.17	0.00002	37.2	12.8	6.26

S002A Annealing furnace

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	SO2 Emission factor = 0.10 x S S = Weight % Sulfur =	Potential Throughput tons/yr
40.0	3728	0.000123	236520

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Combustion Emission Factor in lb/kga	0.6	0.6	0.00001 *(0.10S)*	19.0	0.5	3.2
Process Emission Factor in lb/ton	0.0	0.0	0.0	0.0	0.1	0.0
Potential Emission in tons/yr	1.12	1.12	0.00002	35.4	12.8	5.96

S006 North Boiler

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	SO2 Emission factor = 0.10 x S S = Weight % Sulfur =	
20.9	1948	0.000123	

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	0.6	0.6	0.00001 *(0.10S)*	19.0	0.5	3.2
Potential Emission in tons/yr	0.584	0.584	0.00001	18.5	0.487	3.12

S007 Middle Boiler

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	SO2 Emission factor = 0.10 x S S = Weight % Sulfur =	
10.5	979	0.000123	

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	0.6	0.6	0.00001 *(0.10S)*	19.0	0.5	3.2
Potential Emission in tons/yr	0.294	0.294	0.00001	9.30	0.245	1.57

S008 South Boiler

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	SO2 Emission factor = 0.10 x S S = Weight % Sulfur =	
10.5	979	0.000123	

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	0.6	0.6	0.00001 *(0.10S)*	19.0	0.5	3.2
Potential Emission in tons/yr	0.294	0.294	0.00001	9.30	0.245	1.57

	PM	PM10	SO2	NOx	VOC	CO
Total Potential Emissions in tons/yr	3.46	3.46	0.00007	110	26.5	18.5

Methodology:
1 gallon of LPG has a heating value of 94,000 Btu
Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.094 MMBtu
Emission Factors are from AP 42, Table 1.5-2 (SCC #1-02-010-02)
Emission (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal) / 2,000 lb/ton
+ Process Emission Factor (lbs/ton) (for annealing furnaces) * Throughput(tons/yr) /2000 lbs/ton